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**CITY OF SANTA CLARA dba SILICON VALLEY POWER**

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

In re ) Case Nos. 19-30088 DM (Lead Case)  
PG&E CORPORATION ) 19-30089 DM  
-and- )  
PACIFIC GAS AND ELECTRIC ) Chapter 11  
COMPANY, ) Jointly Administered  
Debtors. )  
 ) **NOTICE OF HEARING ON CITY OF**  
 ) **SANTA CLARA DBA SILICON VALLEY**  
 ) **POWER'S MOTION TO COMPEL**  
 ) **ASSUMPTION OR REJECTION OF**  
 ) **EXECUTORY CONTRACT CONCERNING**  
 ) **THE GRIZZLY DEVELOPMENT AND**  
 ) **MOKELUMNE SETTLEMENT**  
 ) **AGREEMENT**  
 )  
 ) Date: September 14, 2021  
□ Affects PG&E Corporation  
☒ Affects Pacific Gas and Electric Company  
□ Affects both Debtors.  
\* All papers shall be filed in the Lead Case  
No. 19-30088 DM

1 ) Time: 10:00 a.m. (Pacific Time)  
2 ) Courtroom: 17  
3 )  
4 ) Response Deadline: August 31, 2021,  
5 ) 4:00 p.m. (Pacific Time)  
6 )  
7 ) Place: Telephone/Video Appearances  
8 ) Only  
 ) United States Bankruptcy Court  
 ) 450 Golden Gate Ave., 16<sup>th</sup> Floor  
 ) San Francisco, CA 94102  
 ) Judge: Hon. Dennis Montali  
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9 TO DEBTORS, THE UNITED STATES TRUSTEE, AND OTHER INTERESTED  
10 PARTIES:

11 PLEASE TAKE NOTICE that a hearing on the *Motion to Compel Assumption or Rejection*  
12 *of Executory Contract concerning the Grizzly Development and Mokelumne Settlement Agreement*  
13 (the “Motion”) and related pleadings and papers filed by the City of Santa Clara dba Silicon Valley  
14 Power (“Santa Clara”) will be heard by the Honorable Dennis Montali on September 14, 2021 at  
15 10:00 a.m. in the above-entitled court.

16 PLEASE TAKE NOTICE the hearing will not be conducted in the presiding judge’s  
17 courtroom but instead will be conducted by telephone or video. All interested parties should consult  
18 the Bankruptcy Court’s website at [www.canb.uscourts.gov](http://www.canb.uscourts.gov) for information about court operations  
19 during the COVID-19 pandemic. The Bankruptcy Court’s website provides information regarding  
20 how to arrange a telephonic or video appearance. If you have any questions regarding how to appear  
21 at a court hearing, you may contact the Bankruptcy Court by calling (888) 821-7606 or by using the  
22 Live Chat feature on the Bankruptcy Court’s website.

23 PLEASE TAKE NOTICE in the Motion, Santa Clara seeks an order compelling Pacific Gas  
24 and Electric Company to assume or reject the executory contract or unexpired lease referred to as the  
25 Grizzly Development and Mokelumne Settlement Agreement.

26 PLEASE TAKE NOTICE the Motion is brought pursuant to Section 365 of the Bankruptcy  
27 Code, Rule 6006 of the Federal Rules of the Bankruptcy Procedure, Rule 6006-1 of the Bankruptcy  
28 Local Rules of the United States District Court for the Northern District of California and the Court’s

1 authority over unresolved Contract Assumption or Rejection Disputes reserved in Article VIII of the  
2 Debtors' and Shareholder Proponents' Joint Chapter 11 Plan of Reorganized dated June 19, 2020 (Dkt.  
3 8048) and retained in paragraphs 32 through 35 and 78 of the *Order Confirmation Debtors' and*  
4 *Shareholder Proponents' Joint Chapter 11 Plan of Reorganization dated June 19, 2020* (Dkt. 8053).  
5 The Motion is based on this Notice, the Motion, the Declaration of Steve Hance, the Declaration of  
6 Mark Gorton, the Request for Judicial Notice ("RJN") and the Exhibits, all submitted herewith, and  
7 the pleadings and papers filed herewith and on file in the cases and such oral and documentary  
8 evidence as may be presented at the hearing on the Motion.

9 PLEASE TAKE FURTHER NOTICE that any opposition or response to the Motion must be  
10 in writing, filed with the Bankruptcy Court, and served on the counsel for Santa Clara at the above-  
11 referenced address so as to be received by **no later than 4:00 p.m. (Pacific Time) on**  
12 **August 31, 2021.** Any opposition or response must be filed and served on all "Standard Parties" as  
13 defined in the Second Amended Order Implementing Certain Notice and Case Management  
14 Procedures entered by the Court on May 14, 2019 (Dkt. 1996). **Any relief requested in the Motion**  
15 **may be granted without a hearing if no opposition is filed and served in accordance with the**  
16 **Case Management Order.** In deciding the Motion, the Court may consider any other document filed  
17 in these Chapter 11 Cases and related Adversary Proceedings.

18 PLEASE TAKE FURTHER NOTICE that copies of the Motion and its supporting papers can  
19 be viewed and/or obtained: (i) by accessing the Court's websites at <http://www.canb.uscourts.gov>,  
20 (ii) by contacting the Office of the Clerk of the Court at 450 Golden Gate Avenue, San Francisco, CA  
21 94102, or (III) from the Debtor's notice and claims agent, Prime Clerk LLC, at  
22 <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 for the U.S. based parties; or  
23 (929) 333-8977 for international parties or by email at: [pgeinfo@primeclerk.com](mailto:pgeinfo@primeclerk.com). Note that a PACER  
24 password is needed to access documents on the Bankruptcy Court's website.

25 DATED: July 30, 2021.

RESPECTFULLY SUBMITTED,

26 BOUTIN JONES INC.

27 By: /s/ Thomas G. Mouzes  
Thomas G. Mouzes  
28 Mark Gorton

Robert D. Swanson

-and-

Lisa S. Gast

DUNCAN, WEINBERG, GENZER & PEMBROKE,  
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-and-

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CITY OF SANTA CLARA

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